

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

JAMES K. DONOHUE and DRYSHOD
INTERNATIONAL, LLC,

Plaintiffs,

v.

ZHENYIN “STEVEN” WANG
D/B/A DRYCODE

Defendant.

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CASE No: 1:22-cv-00583-LY

DECLARATION OF YU-HAO (MICKEY) YAO

I, Yu-Hao (Mickey) Yao, declare and state as follows:

1. I am counsel of record for Defendant, Zhenyin Wang in the above captioned action.

I submit this Declaration in support of Defendant’s Motion to Dismiss and in opposition to Plaintiff’s Motion for a Preliminary Injunction. I am personally knowledgeable of the matters set forth in this declaration, and if called upon to do so, I could and would competently testify to the following facts set forth below.

2. On or about August 11, 2022, I clicked the Amazon listing (<https://www.amazon.com/DRYCODE-Waterproof-Neoprene-Durable-Gardening/dp/B09L5N5234>) provided by Plaintiff in Plaintiff’s counsel’s declaration (Dkt. No. 6-11). *See Exhibit 1*. I found this product listing is actually sold by Amazon Store “lituo sport”. *Id.* I clicked the Amazon Store “lituo sport” and found that the business seller information shows that the Amazon Store “lituo sport” is owned and operated by Dongguanshi Lituo Yundongyongpin Youxiangongsi, not Defendant Zhenying Wang. *See Exhibit 2*.

3. On or about August 11, 2022, I clicked the Amazon listing (https://www.amazon.com/DRYCODE-Waterproof-Neoprene-Hunting-Outdoor/dp/B095SJDZSD/ref=pd_lpo_1?pd_rd_i=B0B4N66GZ8&psc=1) provided by Plaintiff in Plaintiff's counsel's declaration (Dkt. No. 6-11). *See Exhibit 3.* I found this product listing is actually sold by Amazon Store "lituo sport". *Id.* I clicked the Amazon Store "lituo sport" and found that the business seller information shows that the Amazon Store "lituo sport" is owned and operated by Dongguanshi Lituo Yundongyongpin Youxiangongsi, not Defendant Zhenying Wang. *See Exhibit 4.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 11th day of August 2022, at Los Angeles, California.

By: /s/ Yu-Hao (Mickey) Yao
Yu-Hao (Mickey) Yao, Esq.